

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA

MISTY YOUNGBERG, individually; MISTY YOUNGBERG, as Personal Representative of the ESTATE OF KRISTOPHER YOUNGBERG, deceased; TIFFANY WALDROP, INDIVIDUALLY AND AS GUARDIAN OF CHRISTOPHER WALDROP; CHRISTOPHER WALDROP, BY AND THROUGH HIS GUARIDAN TIFFANY WALDROP; SEAN CONNELL; CHRISTIE CONNELL; KEVIN COFFMAN; HEIDI COFFMAN; WILLIAM OVERSHINER; and LAUREN PADGETT;

Plaintiffs,

vs.

GENERAL MOTORS, LLC;

Defendant.

Case No. 6:20-cv-00339-RAW

**PLAINTIFFS' EXHIBIT LIST**

The following exhibits include those that will be offered by Plaintiffs (collectively the "Federal Agents"), as well as exhibits that may be used to provide a basis for an opinion, a learned treatise, or for cross-examination of an adverse witness at trial:

NO.	EXHIBIT DESCRIPTION	BATES	OBJECTIONS
1	2018-10-05 NNSA Accident Investigation Report		
2	2018-10-05 Oklahoma Highway Patrol Report of Investigation		
3	2018-10-05 Oklahoma Traffic Collision Report		
4	2021-06-30 Sean Connell's Third Amended Answers & Objections to Interrogatories and Request for Production from GM		
5	Typed statement of Sean Connell re crash		
6	Plaintiffs' Initial Disclosure		

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
7	2021-06-04 Amended Complaint, Youngberg v GM		
8	6 photos of white dump truck		
9	2019-10-31 First Amended Petition for Damages, Youngberg v. Forbus		
10	2019-02-25 Original Petition for Damages, Youngberg v. Forbus		
11	Handwritten notations [largely illegible]		
12	2020-08-28 Office of Secure Transportation, Federal Agent Medical Assessment for Human Reliability Program		
13	Safe Driving Techniques for Federal Agents		
14	2020-11-12 Life Care Plan for Sean Connell		
15	First Amended Notice of Oral and Videotaped Deposition of Defendant General Motors LLC on Risks		
16	First Amended Notice of Oral and Videotaped Deposition of Defendant General Motors LLC on Safer Designs		
17	First Amended Notice of Oral and Videotaped Deposition of Defendant General Motors LLC on the Model Van Designs and Warnings		
18	General Motors LLC's Responses and Objections to Plaintiffs' First Amended Notice of Oral and Videotaped Deposition of Defendant General Motors LLC on Safer Designs		
19	General Motors LLC's Responses and Objections to Plaintiffs' First Amended Notice of Oral and Videotaped Deposition of Defendant General Motors LLC on Risks		
20	General Motors LLC's Responses and Objections to Plaintiffs' First Amended Notice of Oral and Videotaped Deposition of Defendant General Motors LLC on the Model Van Designs and Warnings		
21	Brian E. Thompson Resume		

NO.	EXHIBIT DESCRIPTION	BATES	OBJECTIONS
22	Chart re: GM System Safety Process Statement of Work, Appendix B [COFFMAN000041053]		
23	Summary of Applicability of System Safety Process Requirements based on ASIL, Appendix C [COFFMAN000041054]		
24	1993-06-18 MMWR Weekly Article re: Economic Impact of Motor-Vehicle Crashes - United States, 1990 [AGENTS000008]		
25	1996-10 NHTSA Benefits Working Group Paper re: Preliminary Assessment of Crash Avoidance Systems Benefits [AGENTS0000011]		
26	1998 IEEE Article re: Development of Collision Avoidance Systems at Delphi Automotive Systems		
27	Excerpts re: NHTSA Automotive Collision Avoidance System, Field Operational Test, First Annual Report, [AGENTS000137]		
28	2019-08-22 Affidavit of Brian E. Thompson; <i>Wen v. GM</i> [AGENTS01187]		
29	2021-06-14 Affidavit of Brian E. Thompson; <i>Youngberg v. GM</i>		
30	NTSB Special Investigation Report re: Vehicle and Infrastructure-based Technology for the Prevention of Rear-end Collisions [AGENTS000321]		
31	5/10/04 2006 GMX-272 Subsystem Technical Specification Re: Adaptive Cruise Control with Forward Collision Alert [COFFMAN000039936]		
32	Presentation re LDW/FCA CR/DN		
33	Change Request/Decision Notice Re: GMT966/967/561 CVWG '12 MY - Study Impacts Add Single Camera Dual Mode LDW & FCA [COFFMAN00024646]		
34	2011-07-28 Purchase Contract, Magna Electronics-GM Re: Camera ASM-FRT View ECCN=6A993 [COFFMAN000040976]		

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
35	2011-02-02 Component Technical Specification Re: Front Camera Module [COFFMAN000032851]		
36	2010-01-22 Feature Technical Specification Re: Forward Collision Alert [COFFMAN000032822]		
37	2012-11-05 Purchase Contract, Magna Electronics-GM Re: Camera ASM-FRT View ECCN=6A993 [COFFMAN000040793]		
38	2013-05-06 Purchase Contract, Conti Temic-GM Re: Camera ASM-FRT View ECCN=6A993 [COFFMAN000040858]		
39	Feature Technical Specification Re: Front Impact Mitigation [COFFMAN000011354]		
40	Component Technical Specification Re: Generation 3 Front Camera Module [COFFMAN000029674]		
41	Component Technical Specification Re: Re: Camera and Image Processing Module Generation 4 Front Camera Module [COFFMAN000011508]		
42	Component Technical Specification Re: Long Range Radar [COFFMAN000011649]		
43	Component Technical Specification Re: Short Range Radar Enhanced Safety System [COFFMAN000011794]		
44	2013 Cadillac SRX Owner Manual excerpts [COFFMAN000035143]		
45	2012-05-09 GM Evaluation Report Re: 2013 GMT16X Forward Collision Alert System Confirmation Test [COFFMAN000032727]		
46	CIB Summary Data Sheet Re: Collision Imminent Braking		
47	GM Evaluation Report Re: 2013 GMT155 Collision Imminent Braking Feature Subsystem Validation Test [COFFMAN000032638]		
48	Data Sheet CG2927 for GMW16624 Re: Imminent Alert [COFFMAN000006196]		

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
49	Activity Request 2018-02-27-28412 Re: Vehicle No. GPKNT201 [COFFMAN000006194]		
50	2018-11-06 GM Authority Article Re: 2019 Chevrolet Express Van Gets Forward Collision Alert [AGENTS001748]		
51	Component Technical Specification Re: Generation 5 Front Camera Module [COFFMAN000007474]		
52	2017-07-27 Feature Technical Specification Re: Forward Impact Mitigation [COFFMAN000007898]		
53	2018-02-19 GM Evaluation Report Re: 2019 GMT 610 ESS1 Forward Collision Alert Feature Subsystem Test GMW16624 [COFFMAN000006122]		
54	2013 Chevrolet Express Owner Manual [COFFMAN00000053]		
55	GM Evaluation Report Re: 2009 GMT610 Brake Assist System based on Brake Pedal Application Speed Test [COFFMAN000029229]		
56	GM Evaluation Report Re: 2019 GMT610 ESS1 GMW16374 Forward Collision Warning NHTSA NCAP System Confirmation Test [COFFMAN000006200]		
57	Spreadsheet Re: MVSS 126, Electronic Stability Control [COFFMAN000033890]		
58	Spreadsheet re: Features/Content Electrical Architecture Support (NG Cadillac STS)		
59	PowerPoint re: NG HD G-Van Program Scope Alternatives		
60	2013 Chevrolet Express Owner Manual [COFFMAN00000053]		
61	2013 Chevrolet Express Owner Manual excerpts		
62	2012-01 PowerPoint Re: Fullsize Van U.S. Commercial Fleet Managers & Upfitters Total Cost of Ownership		

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
63	2012-01 PowerPoint Re: Fullsize Van U.S. Commercial Fleet Managers & Upfitters Total Cost of Ownership		
64	Change Request/Decision Notice re: Backup Camera with Mirror Display [COFFMAN000039652]		
65	Change Request/Decision Notice re: Backup Camera with Mirror Display with Demonstrative Excerpts		
66	GM Evaluation Report Re: Hydraulic Brake System - FMVSS 105 Validation [COFFMAN000031618]		
67	Demonstrative Excerpts Re: Exhibit 66		
68	GM Evaluation Report Re: 2009 GMT610 Brake Assist System based on Brake Pedal Application Speed Test [COFFMAN000029229]		
69	Demonstrative Excerpts Re: Exhibit 68		
70	2013 Cadillac SRX Owner Manual [COFFMAN000035143]		
71	Demonstrative Excerpts Re: Exhibit 70		
72	PowerPoint re: GMC Savana & Chevrolet Express Stabilitrak [COFFMAN000040779]		
73	Demonstrative Excerpts Re: Exhibit 72		
74	General Motors LLC's Amended and Supplemental Responses and Objections to Plaintiff Misty Youngberg's First Set of Interrogatories Nos. 3, 6, 7, 9, 10, 12, 13, 14, 15, 16, 17 and 18 to Defendant General Motors LLC		
75	2020-02-03 Purchase Contract ZF Active Safety-GM Re: Camera ASM-FRT View ECCN=6A993 [COFFMAN000011037]		
76	Binder of Documents Produced by the Witness		
77	PowerPoint re: Crash Avoidance NCAP Strategy Vision-based Lane Departure Warning & Forward Collision Alert, Roll-out Plan & Tier 2 Proposal		

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
78	2002-03-07 PowerPoint Re: GMT610 2003 Chevy Express & GMC Savana Van Safety Performance		
79	2013 Cadillac SRX Owner Manual		
80	Demonstrative Excerpts Re: Exhibit 79		
81	Popular Mechanics Special Recognition Re: Breakthrough Award Winners for 2012 for Crash Avoidance System [COFFMAN000041059]		
82	Demonstrative Exhibit Re: Exhibit 81		
83	Ray Kiefer deposition exhibits from Spencer v GM		
84	GM Heritage Center, Self-Driving Cars in 1956		
85	1956 Firebird II video from GM Heritage website		
86	2021-08-17 Cadillac Concept had radar crash-avoidance in 1959		
87	1979 Struble - Highlights of RSV program		
88	1980 Kossar High Technology RSV		
89	1996-10 NHTSA Prelim Assess of Crash Avoid [EXCERPTS 11 p]		
90	1996-10 NHTSA Preliminary Assessment of Crash Avoidance Systems Benefit AGENTS000011-AGENTS000122		
91	2000-12 NHTSA Auto Collision Avoidance System Field Operation Test, 1st Annual Report. AGENTS000137- AGENTS000304		
92	2001-05-01 NTSB Special Investigation Report, Vehicle & Infrastructure Based Technology for Prevention of Rear-end Collisions		
93	2005 Automotive Collision Avoidance System Field Operational Test Final Report, NHTSA		
94	2005-06-06 Motor Vehicle Safety Technology Development, The Road Ahead. AGENTS011939- AGENTS011956		
95	2008 Saturn Ad - The Rich Don't Deserve to be Safer		
96	2010 NHTSA Safety is Not an Option		

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
97	2011-01 Devel of Camera-Based Fwd Collision Alert Sys AGENTS000465-AGENTS000476		
98	2012-02-10 Sensor Fusion Enables Cadillac Safety Adv, AGENTS000638		
99	2013-01 23ESV-000194 Advanced Brake Assist - Real World effectiveness AGENTS001107-AGENTS001120		
100	2014-01 UMTRI Assess of Eff of Adv Collision Avoid Tech AGENTS001121-AGENTS001165		
101	2014-09-09 GM Envis Day When Cars Don't Crash AGENTS001173-AGENTS001176		
102	2016-01-27 Effect of fwd collision warning & auton emergency braking AGENTS001490-AGENTS001500		
103	2017 25ESV-000283 Performance Comparison bt Camera Only AEB-FCW &		
104	2017-04 HLDI Bull34.06 GM collision avoidance feats AGENTS001508-AGENTS001525		
105	2018-08-08 The history of adaptive cruise control _ Autonomous Veh Intl		
106	2018-10 Field Study of Lt-Veh Crash Avoid Systems, Autom Em Braking COFFMAN000008209		
107	2018-11-13 IIHS GM front crash prevention systems cut police-reported crashes AGENTS001758-AGENTS001761		
108	2019-07-12 Anal of Field Eff of GM Prod Act Safety & Headlights Sys COFFMAN0000010081		
109	2019-09 UMTRI Anal of Field Effectiveness of GM Safety & Adv Headlighting Systems AGENTS001790-AGENTS001822		
110	2021-06-20 Field effect of GM adv driver assist & headlight sys COFFMAN0000038801		
111	Dr. Kiefer Binders re: File Materials		



NO.	EXHIBIT DESCRIPTION	BATES	OBJECTIONS
112	[not used] (Kiefer, Ray)		
113	[not used] (Kiefer, Ray)		
114	[not used] (Kiefer, Ray)		
115	1996-10 NHTSA Benefits Working Group Report, Preliminary Assessment of Crash Avoidance Systems Benefits [AGENTS 11]		
116	Excerpts re: October 1996 NHTSA Benefits Working Group Report, Preliminary Assessment of Crash Avoidance Systems Benefits [AGENTS 11]		
117	2005-05 NHTSA Final Program Report Re: Automotive Collision Avoidance System Field Operation Test [COFFMAN 24947]		
118	2005-05 NHTSA Final Program Report Re: Automotive Collision Avoidance System Field Operation Test [COFFMAN 24947]		
119	2013 Cadillac SRX Owner Manual [COFFMAN 35143]		
120	Excerpts re: 2013 Cadillac SRX Owner Manual [COFFMAN 35143]		
121	Elsevier Accident Analysis and Prevention Article Re: "Field effectiveness of General Motors advanced driver assistance and headlighting systems [COFFMAN 38801]		
122	Excerpts re: Elsevier Accident Analysis and Prevention Article Re: "Field effectiveness of General Motors advanced driver assistance and headlighting systems [COFFMAN 38801]		
123	Popular Mechanics Special Recognition Re: Breakthrough Award Winners for 2012 for Crash Avoidance System [COFFMAN000041059]		
124	Excerpts from Popular Mechanics Special Recognition Re: Breakthrough Award Winners for 2012 for Crash Avoidance System [COFFMAN000041059]		
125	2019-04-26 Overshiner's Answers to Forbus Interrogatories		

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
126	Statement of William Overshiner		
127	2018-10-08 Dr. Kelley History (William Overshiner)		
128	OKHP Drawing of scene, with yellow highlights		
129	2020-12-29 Superior Health Care re Overshiner 848-861		
130	2019-02-23 Opinion Notes of Dr. Christopher Jordan (Overshiner 862-868)		
131	2018-10-16 ODP/OHP Memo of Interview of Kevin Coffman		
132	Nuclear Materials Courier GS-084-10 re transport of nuclear materials		
133	4 Pre-collision photographs of van		
134	OST Basic Off Road Driving - Tactical Vehicle Operations		
135	2015-2020 Kevin Coffman W2s		
136	2019-06-12 Kevin Coffman Answers to Direct Traffic Control's Interrogatories & Request for Production (highlighted)		
137	2020-11-10 Life Care Plan for Kevin Coffman, by Jason Marchetti, MD, FAAPMR, CLCP		
138	2019-06-17 Overshiner Discovery Responses to DTC		
139	2020-11-24 Life Care Plan for William Overshiner, 0744-0801		
140	Jeffrey Clark LinkedIn Profile		
141	Technical Description of the Radar System ARS300, Rev. 2.8. COFFMAN00041064-41111		
142	2011-12-16 Enhanced Safety System (ESS) & Volume Safety System (VSS) Long Range Radar Positioning and Mounting Requirements, Rev. 2.2.		
143	Presentation, Component Technical Specification - Long Range Radar		
144	2018-10-05 Daniel Forbus statement to OKDP, AGENTS003983-3984		
145	Lights on rear of 1996 Kenworth dump truck, with red circles, AGENTS004001		

NO.	EXHIBIT DESCRIPTION	BATES	OBJECTIONS
146	Crash scene rendering, with vehicles, by Trooper Baker, AGENTS003961		
147	Photos of crash scene and vehicles, AGENTS010708, 010712, 011113, 011110		
148	Four photos of dump truck and van, AGENTS010639		
149	Tom Sliney's LinkedIn Profile		
150	2002-11-01 NTSB Safety Recommendation H-02-29 re potential of technological systems, particularly electronic stability control systems, to assist drivers of 15-passenger vans [AGENTS015536-AGENTS015540]		
151	2004-06 NHTSA/DOT HS 809 704 Testing the Dynamic Rollover Resistance of Two 15-Passenger Vans with Multiple Load Configurations [AGENTS015569-AGENTS015629]		
152	2002-11-19 Market Segment: Large Passenger Vans charts [file COFFMAN000036285.XLS]		
153	2002-08-26 GM Evaluation Report, FMVSS 105, MY2004 G33706 GMT610, Hydraulic Brake System Validation [COFFMAN000031618-COFFMAN000031652]		
154	Excerpt from 2002-08-26 GM Evaluation Report, FMVSS 105, MY2004 G33706 GMT610, Hydraulic Brake System Validation [COFFMAN000031618-COFFMAN000031652]		
155	Excerpt from 2013 Chevrolet Express Owner's Manual re Driving and Operating; Braking		
156	2012-01 Fullsize Van, US Commercial Fleet Managers & Upfitters, Total Cost of Ownership. Excerpts		
157	2010-01-08 GM Change Request / Decision Notice, Backup camera with Mirror Display, MY2013 & beyond		

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
158	Excerpt from 2010-01-08 GM Change Request / Decision Notice, Backup camera with Mirror Display, MY2013 & beyond		
159	2010-08-26 Change Request / Decision Notice, Backup sensors for rear park assist, MY2013 & beyond		
160	Excerpts from 2010-08-26 Change Request / Decision Notice, Backup sensors for rear park assist, MY2013 & beyond		
161	2015-09-24 Change Request / Decision Notice, Green Zone - Add Lane Departure Warning (UFL) & Forward Collision Alert (UEU), MY2019 & beyond		
162	Excerpts from 2015-09-24 Change Request / Decision Notice, Green Zone - Add Lane Departure Warning (UFL) & Forward Collision Alert (UEU), MY2019 & beyond		
163	OHP Trooper Baker's Interview of Donald Thomas		
164	OHP Statement of Donald Thomas		
165	Audio of OHP Trooper Baker's Interview of Donald Thomas		
166	Resume of Lisa Manwell		
167	Trooper Tim Baker's resume		
168	OHP Motor Vehicle Death Case File		
169	OHP Photographic Log [Agents 10625 – 10629]		
170	OHP Photos [Agents 10630, 10637, 10654, 10655]		
171	OHP Photos [Agents 11083 – 11100]		
172	OHP Trooper Baker's Investigative Activity Report		
173	OHP Supplemental Report, Removal of Van Contents		
174	OHP Skid test		
175	LinkedIn profile of Earl Harris		

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
176	2021-06-04 GM's Amended and Supplemental Responses and Objections to Plaintiff Misty Youngberg's First Set of Interrogatories Nos. 3, 6, 7, 9, 10, 12, 13, 14, 15, 16, 17, and 18 to Defendant General Motors		
177	Brochure: 2004 Cadillac XLR Base 2dr Roadster pricing & specifications, AGENTS015652-AGENTS015665		
178	2005 Cadillac STS review - Roadshow, AGENTS013357-AGENTS013361		
179	2006-09-01 2006 Cadillac DTS, The last stalwart at Cadillac gets a sportier shape. Car & Driver. AGENTS013921-AGENTS013927		
180	2011-09-29 New Camera-Based Collision Alert Debuts on GMC Terrain. GMC Pressroom. AGENTS013948-AGENTS013949		
181	2012-03-27 Technology on XTS, ATS Can Help Avoid Crashes. GM Newsroom. AGENTS013952-AGENTS013954		
182	2012-04-02 Cadillac Enhances Technology and Design on 2013 SRX. GM Newsroom. AGENTS013955-AGENTS013961		
183	2013-05-29 2014 Sierra Denali Pairs High-Tech Luxury and Capability. GM Newsroom. AGENTS015294-AGENTS015297		
184	2013 Chevrolet Express Owner's Manual, Table of Contents, Coffman000053		
185	2021-10-06 General Motors' Second Supplemental Responses and Objections to Plaintiff's First Set of Interrogatories, No. 12		
186	Connell Retention Agreement (Marchetti file)		
187	Examinee Information Form (Marchetti file – Connell)		
188	Notes from Interview (Marchetti file – Connell)		
189	Dr. Risko Letter (Marchetti file – Connell)		

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
190	Overshiner Retention Agreement (Marchetti file – Connell)		
191	Examinee Information Form (Marchetti file)		
192	Notes from Interview (Marchetti file)		
193	2021-11-01 Ms. Cox's initial report regarding Kevin Coffman		
194	Lisa Cox's CV		
195	Lisa Cox's testimony list		
196	Lisa Cox's handwritten notes regarding Kevin Coffman		
197	Emails between Kevin Coffman and Lisa Cox		
198	Firearms Instructor Position Description		
199	Physical Performance Requirements Group A (Firearms)		
200	2021-11-04 Initial Report of Ms. Cox regarding Sean Connell		
201	Ms. Cox's handwritten notes concerning Sean Connell		
202	List of DOE tests with dates and scores for Sean Connell		
203	2021-10-28 Initial Report of Ms. Cox regarding William Overshiner		
204	Ms. Cox's handwritten notes concerning William Overshiner		
205	Record from Dr. McAlpin related to MMI for William Overshiner		
206	2021-11-24 Notice of Deposition of Sharna Wood		
207	Sharna Wood, Ph.D. CV		
208	2020-01-01 Pricing Menu for Sharna Wood, Ph.D.		
209	Sharna Wood, PhD. Testimony List		
210	2020-11-11 Sharna Wood, Ph.D. Invoice re Christopher Waldrop		
211	2022-02-21 Sharna Wood, Ph.D. Invoice re Christopher Waldrop		
212	Access Texas / Sharna Wood, Ph.D. questionnaire re Christopher Waldrop		

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
213	2020-11-16 Dr. Sharna Wood's Neurological Assessment report for Christopher Waldrop		
214	Notice of Videotaped Deposition of Dr. Jason Marchetti		
215	Dr. Marchetti's Retention Agreement (Waldrop)		
216	Dr. Marchetti's Invoices (Waldrop)		
217	Dr. Marchetti's Testimony List		
218	Dr. Marchetti's Catastrophic Life Care Plan for Christopher Waldrop, dated Jan. 18, 2021		
219	Dr. Marchetti's Examinee Information Form for Christopher Waldrop		
220	Dr. Marchetti's Intake Questionnaire for Christopher Waldrop		
221	Retention Agreement between Dr. Marchetti and Kevin Coffman		
222	Dr. Marchetti's invoices concerning work on behalf of Kevin Coffman		
223	Dr. Marchetti's patient questionnaire concerning Kevin Coffman		
224	2020-11-10 Life Care Plan for Kevin Coffman		
225	2021-10-18 Life Care Plan for Kevin Coffman		
226	1 Kiefer (1999) Development and Validation of Functional Definitions and Evaluation Procedures for Collision Warning Avoidance Systems (Keifer DepEx 83)		
227	2 Kiefer (2005) Status of NHTSA's Rear End Crash Prevention Research Program (Keifer DepEx 83)		
228	3 2018 Toyota Ad Common Sense, Meet Toyota Safety Sense (Keifer DepEx 83)		
229	4 2019 Analysis of the Field Effectiveness of General Motors Production Active Safety and Advanced Headlighting Systems (Keifer DepEx 83)		

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
230	5 2020 General Motors, University of Michigan Show Automated Safety Features Preventing Crashes (Keifer DepEx 83)		
231	6 2001 SAE FCW Prelim Require for Crash Alert Timing 2011-03-05 (Keifer DepEx 83)		
232	7 11.1 Benefit Analysis for Rear End Collision Avoidance Systems Bosch 09-0281 546-553 (Keifer DepEx 83)		
233	8 Video: Kiefer General Motors, University of Michigan Show Automated Safety Features Preventing Crashes 10.09.2020.mp4 (Keifer DepEx 83)		
234	9 Transcript from Kiefer video on GM website.docx (Keifer DepEx 83)		
235	10 ISO_15623_2013(en) (Keifer DepEx 83)		
236	11 j2400_200308.fm (Keifer DepEx 83)		
237	12 2001 SAE FCW Prelim Require for Crash Alert Timing 2011-03-05 (Keifer DepEx 83)		
238	13 3.1 2018 GMC Sierra Download by Sheriff 272-301 (Keifer DepEx 83)		
239	14 2016 Kiefer author NHTSA Large Scale Field Test of Forward Collision Avoidance and Lane Departure Warning System Feb 2016 773-902 (Keifer DepEx 83)		
240	15 Video: 16.1 Equinox Chevrolet Pitch Black Commercial 2157.mp4 (Keifer DepEx 83)		
241	16 Video: 16.2 Equinox Forward Collision Alert Math Problem Chevy Films 2158.mp4 (Keifer DepEx 83)		
242	17 Video: 16.3 Equinox Forward Collision Alert Think Fast Chevy Films 2159.mp4 (Keifer DepEx 83)		
243	18 2001 Rear End Collision Warning System Field Operation Test Status Report (Keifer DepEx 83)		
244	19 2001 Risk Assessment and Product Liability by Ross & Main (Keifer DepEx 83)		



<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
245	20 2003 Automotive Collision Avoidance System Field Operational Test ACAS FOT 3rd Annual Report CAMP (Keifer DepEx 83)		
246	21 2003 Forward Collision Warning Requirements Project Final Report Task 1 CAMP (Keifer DepEx 83)		
247	22 2003 Second Annual Report of the Crash Avoidance Metrics Partnership CAMP (Keifer DepEx 83)		
248	23 2005 Third Annual Report of the Crash Avoidance Metrics Partnership CAMP (Keifer DepEx 83)		
249	24 2006 Context-aware Pedestrian Detection Using LIDAR (Keifer DepEx 83)		
250	25 2007 Collision Warning With Auto Brake - A Real Life Safety Perspective (Keifer DepEx 83)		
251	26 2010 CIB Second Annual Report Pedestrian CAMP (Keifer DepEx 83)		
252	27 2011 Objective Tests for Automatic Crash Imminent Braking System Appendices 2 of 2 CAMP (Keifer DepEx 83)		
253	28 2011 Objective Tests for CIB Systems Final Report Vol 1 of 2 CAMP (Keifer DepEx 83)		
254	29 2008 Centre for Automotive Safety Research Vehicle Improvements to Reduce the Number and Severity of Rear End Crashes Adeline University Australia (Keifer DepEx 83)		
255	30 2010 Analysis of Crash Data to Estimate the Benefits of Emerging Vehicle technology R Anderson (Keifer DepEx 83)		
256	31 2012 Centre for Automotive Safety and Research Potential Benefits of Forward Collision Avoidance Technology (Keifer DepEx 83)		
257	32 2002 Crash Avoidance Metrics Partnership Annual Report CAMP (Keifer DepEx 83)		

NO.	EXHIBIT DESCRIPTION	BATES	OBJECTIONS
258	33 Large Scale Field Test of Forward Collision Alert and Lane Departure Warning System (Keifer DepEx 83)		
259	[not used]		
260	[not used]		
261	[not used]		
262	[not used]		
263	[not used]		
264	[not used]		
265	[not used]		
266	Handwritten notes of Micky Gilbert		
267	2021-10-29 Report of Micky Gilbert		
268	2020-06-11 Gilbert Invoice		
269	Gilbert Accident Reconstruction photographic overlays		
270	Gilbert Impact Calculations, 33 ft		
271	Gilbert Calculating A and B Stiffness Coefficients from Crash Test: NHTSA M50108		
272	Gilbert Impact Calculations, 61 ft		
273	Gilbert Crush Profile		
274	10 CFR Part 202-Production or Disclosure of Material or Information		
275	2021-01-27 Letter Hammond from to Sanchez		
276	2021-01-26 Notice of Deposition of Michael Hillman for March 4, 2022		
277	5.0 Board Members, Advisors and Consultants, including Mike Hillman. CONNELL006950-6952		
278	2018-10-18 Memo for Hillman from Wyka re Federal Accident Investigation		
279	DOE Order 225.1B re responsibilities, authorities and requirements for conducting accident investigations		
280	2012-09 DOE, A Guide for Accident Investigation Chairpersons		
281	2016-01-28 Efficacy of AOCC Non-Operational E-Plated Fleet to a GSA Fleet		
282	Excerpt, Times of Departure (Connell006891)		

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
283	Fatal Motor Vehicle Traffic Accident Analysis, Amit Reizes		
284	2018-10-31 Email string re Luggage Photos (Hillman)		
285	Review Comments for the OST Vehicle Fatality Report, with highlights, Hillman79-114		
286	2018-10-27 Hillman email re Draft of Narrative of Events		
287	2018-12-07 Hillman email re Logan Thomas' Actions during vehicle accident of Oct 5, 2018		
288	Screenshot of computer files (Hillman)		
289	2022-02-01 Hillman email string re Investigative Board DOE NNSA Agent Overshiner's statement		
290	2022-01-24 Notice of Deposition of Michael Hillman for March 9, 2022		
291	Neil Hannman's notes		
292	2021-11-05 FACT Hanneman Report		
293	EyeSight Limitations brochure, Subaru		
294	Subaru EyeSight booklet excerpt re PreCollision Braking System		
295	Subaru EyeSight booklet excerpt re About EyeSight		
296	Group of documents brought to deposition by Neil Hanneman		
297	FACT Invoices		
298	Presentation by Shawn Harrington of Subaru ADAS System		
299	An Overview of the Subaru EyeSight Advanced Driver Assistance System, Harrington, Shawn		
300	2021-11-05 Shawn Harrington Report		
301	2021-04 Euro NCAP Test Protocol, AEB Car-to-Car Systems		
302	Shawn Harrington's handwritten notes and calculations		
303	2021-11-05 Report of David Peck		
304	David Peck's CV		
305	Photo of road with skid marks		

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
306	Photo of road with skid and burn marks, with blue circles		
307	2019-06-18 Automotive IQ, Intelligent Braking conference presentation		
308	A Review of the VORAD Vehicle Detection and Driver Alert System, SAE 922495, Murphy & Woll		
309	David Peck Invoice, Sept - Nov. 2021		
310	Print-out of certain Peck file documents		
311	2021-11-05 Report of William Vigilante		
312	Vigilante Invoices		
313	Vigilante's Notes from phone conferences with Gilbert and Hanneman		
314	Vigilante testimony list, with handwritten notes of P or D		
315	2021-12-31 GM Annual Report, Form 10K		
316	2004 Traffic Safety Facts FARS-GES Annual Report		
317	2008 Traffic Safety Facts FARS-GES Annual Report		
318	2009 Traffic Safety Facts FARS-GES Annual Report		
319	CV of Micky Gilbert		
320	File of Micky Gilbert		
321	Photos and charts from report of Micky Gilbert		
322	Micky Gilbert trial presentation summary documents		
323	Micky Gilbert's reference material		
324	CV of Neil Hanneman		
325	Photos, charts from report of Neil Hanneman		
326	Neil Hanneman trial presentation summary documents		
327	Neil Hanneman's file		
328	Video: 05-02-02c Caddy Same 10.mp4		
329	Video: 07-01-02c Subaru Same 10.mp4		

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
330	Video: 07-02-06c Subaru Half 20.mp4		
331	Video: Youngberg Test 1.mp4		
332	Video: Youngberg Test 4-5-6.mp4		
333	Automatic Emergency Braking reference material		
334	IIHS information – ADAS		
335	2013 IIHS Safety Ratings		
336	2020 IIHS Safety Ratings		
337	NHTSA information - Automatic Emergency Braking		
338	Hanneman Reference Material		
339	Master Test Sheet		
340	13.47 ADAS information		
341	2020 Chevrolet Express evaluation video, TimerP9220017.mp4		
342	2021 Chevrolet Express evaluation video, TimerP9220019.mp4		
343	2022 Chevrolet Express evaluation video, TimerP9220020.mp4		
344	2023 Chevrolet Express evaluation video, TimerP9220021.mp4		
345	Schittenhelm, H., “Advanced Brake Assist – Real World effectiveness of current implementations and next generation enlargements by Mercedes-Benz, paper number 13-0194, 23rd Enhanced Safety Vehicle Conference, 2013.		
346	Lindman, M., et. al., “Benefit Estimation Model for Pedestrian Auto Brake Functionality.”		

NO.	EXHIBIT DESCRIPTION	BATES	OBJECTIONS
347	National Highway Traffic Safety Administration, “Automotive Collision Avoidance System Field Operational Test, First Annual Report.” DOT HS 809 196, December 2000.		
348	Najm, W., G., Smith, D., L., “Definition of a Pre-Crash Scenario Typology for Vehicle Safety Research”, NHTSA paper number 07-0412.		
349	Lewis, E., E., “How safe is safe enough?”, 2014		
350	OUII 3d (Rev 2009), “A product is defective when it is not reasonably fit for the ordinary purposes for which such products are intended or may reasonably be expected to be used.” (OUII 12.2)		
351	NHTSA, “Large-Scale Field Test of Forward Collision Alert and Lane Departure Warning Systems.” U.S Department of Transportation, National Highway Traffic Safety Administration, DOT HS 812 247, February 2016.		
352	NHTSA, “Crash Avoidance Metrics Partnership, Annual Report, April 2001 – March 2002”, U.S Department of Transportation, National Highway Traffic Safety Administration, DOT HS 809 531, December 2002.		
353	Shawn Harrington's CV		
354	Shawn Harrington's Photos, charts from report		
355	Shawn Harrington trial presentation summary documents		
356	Shawn Harrington's file materials		
357	European New Car Assessment Programme (Euro NCAP) Test Protocol – AEB Systems. Version 3.0.3, April 2021.		
358	David Peck's Photos & Charts, from report		
359	David Peck's trial presentation summary documents		
360	David Peck's file materials		

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
361	1992-11-16 SAE922495 Review of VORAD Vehicle Detection & Driver Alert System		
362	1993-11-01 SAE933063 Review of Eaton VORAD Vehicle Coll Warning System		
363	1995-11-13 SAE952619 Vehicle Collision Warning System w Data Recording Capability		
364	1997-08-06 SAE972669 Monopulse Radar for Intelligent Cruise Control		
365	1997-11-17 SAE973184 Radar Based Adap Cruise Cont for Truck Appls		
366	2015 Red'd stopping distance & facilitating AEB by appl of advanced real-time data		
367	2018-08-03 Brake system architecture for highly automated driving		
368	2019-06-18 IQPC Braking conference material		
369	William Vigilante's CV		
370	William Vigilante's Photos & Chart, from report		
371	William Vigilante's trial presentation summary documents		
372	William Vigilante's file materials		
373	SAE international (2003). J2400: Human Factors in Forward Collision Warning Systems: Operating Characteristics and User Interface Requirements.		
374	ISO (2013). 15623-2013, Intelligent transport systems – Forward vehicle collision warning systems, performance requirements and test procedures.		
375	Kiefer, LeBlanc, Palmer, Salinger, Deering, and Shulman (1999). Development and Validation of Functional Definitions and Evaluation Procedures for Collision Warning/Avoidance Systems. DOT HS 808 964. NHTSA.		

NO.	EXHIBIT DESCRIPTION	BATES	OBJECTIONS
376	CAMP (2005). Vehicle Safety Communications Project: Task 3 Final Report; Identify Intelligent Vehicle Safety Applications Enabled by DSRC. DOT HS 809 859. P. 99.		
377	LeBlanc, Kiefer, Deering, Shulman, Palmer, and Salinger (2001). Forward Collision Warning: Preliminary Requirements for Crash Alert Timing. SAE Technical Paper 2001-01-0462.		
378	Schittenhelm (2013). Advanced Brake Assist – Real World effectiveness of current implementations and next generation enlargements by Mercedes-Benz. Paper No. 13-0194.		
379	Alexander & Lunenfeld (1986). Driver Expectancy in Highway Design and Traffic Operations. FHWA-TO-86-1. Pp. 7-27.		
380	Krauss (2015). Forensic Aspect of Driver Perception and Response (4th Ed). Pp. 13,14,51-54,76-78,84-89,93,94		
381	AASHTO (2011). A Policy on geometric design of highway and streets (6th Edition). American Association of State Highway and Transportation Officials. Pp. 2-36 to 2-42, 3-1 to 3-8.		
382	OK DPS (2017). Oklahoma Driver's Manual. Pp. 4.2, 5.1 to 5.12, 7.1 to 7.6, 8.1, 9.4		
383	Flannigan, LeBlanc, Bogard, Nobukawa, Narayanaswanny, Leslie, Kiefer, Marchione, Beck, & Lobes (2016). Large-Scale Field Test of Forward Collision Alert and Lane Departure Warning Systems. DOT HS 812 247		
384	Isaksson-Hellman & Lindman (2015). Evaluation of rear-end collision avoidance technologies based on real world crash data. In Proceedings of the 3rd International Symposium on Future Active Safety Technology. Gothenburg, Sweden.		



NO.	EXHIBIT DESCRIPTION	BATES	OBJECTIONS
385	Glassbrenner, Morgan, Kreeb, Svenson, Liddell, and Barickman (2017). A Target Population for Automatic Emergency Braking in Heavy Vehicles. DOT HS 812 390.		
386	NTSB (2001). SIR: Vehicle and Infrastructure-Based Technology for the Prevention of Rear-End Collisions. PB2001-917003, NTSB/SIR-01/01. Pp. 1, 2.		
387	Kiefer, Cassar, Flannagan, Jerome, & Palmer (2005). Surprise Braking Trials, Time-to-Collision and “First Look” Maneuvers Under Realistic Rear-End Crash Scenarios. DOT HS 809 902.		
388	Sayer, LeBlanc, Bogard, Funkhouser, Bao, Buonarosa, & Blankespoor (2011). Integrated Vehicle-Based Safety Systems Field Operations Test, Final Program Report. DOT HS 811 482. NHTSA.		
389	Blower (2014). Assessment of the Effectiveness of Advanced Collision Avoidance Technologies. UMTRI-2014-03. P. 23		
390	Tidwell, Blanco, Trimble, and Atwood (2015). Evaluation of Heavy-Vehicle Crash Warning Interfaces. DOT HS 812 191. NHTSA.		
391	Cicchino (2017). Effectiveness of forward collision warning and autonomous emergency braking systems in reducing front-to-rear crash rates. Accident Analysis and Prevention, 99. Pp. 142-152.		
392	Leslie, Keifer, Meitzner, & Flannagan (2011). Effectiveness of general motors advanced driver assistance and headlighting systems. Accident Analysis and Prevention, 159. Pp. 1-7		
393	NHTSA (2009). Memorandum dated 2/13/2009. Action: Submissions of Questions and Comments Given to NHTSA Regarding NCAP Enhancements. Docket NHTSA-2006-26555		

NO.	EXHIBIT DESCRIPTION	BATES	OBJECTIONS
394	UOI Public Policy Center (2006). Rear End Crash Avoidance System (RECAS) Algorithms and Alerting Strategies: Effects of Adaptive Cruise Control and Alert Modality on Driver Performance. Final Report. <a href="https://ir.uiowa.edu/ppc_human_factors/2/">https://ir.uiowa.edu/ppc_human_factors/2/</a>		
395	Johansson and Rumar (1971). Drivers' Brake Reaction Times. Human Factors, 13(1). Pp. 23-27.		
396	Olson & Sivak (1986). Perception-response time to unexpected roadway hazards. Human Factors, 28(1). Pp. 91-96.		
397	Adams Funeral Home Invoice and Notes re Youngberg	YNGBRG00001–00004	
398	Medical Examiner's Report re Youngberg	YNGBRG00005–00012	
399	Information for Economic Losses Determination re Youngberg	YNGBRG00013–00017	
400	Certificate of Release or Discharge from Duty re Youngberg	YNGBRG00018	
401	Final Leave & Earnings Statement re Youngberg	YNGBRG00019	
402	Youngberg 2010 Tax Return	YNGBRG00020–00022	
403	Youngberg 2011 Tax return	YNGBRG00023–00025	
404	Youngberg 2013 Tax Return	YNGBRG00026–00027	
405	Youngberg 2014 Tax Return	YNGBRG00028–00029	
406	Youngberg 2015 Tax Return	YNGBRG00030–00045	
407	Youngberg 2016 Tax Return	YNGBRG00046–00056	
408	Youngberg 2017 Tax Return	YNGBRG00057–00067	
409	Youngberg 2018 Tax Return	YNGBRG00067-00086	
410	Youngberg Correspondence from Economic and Financial Consulting Group dated January 11, 2021	YNGBRG00087–00137	

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
411	Youngberg Statement from Economic and Financial Consulting Group dated January 11, 2021	YNGBRG00138	
412	Youngberg Photos	YNGBRG00139–00231	
413	Youngberg Application for Letters of Independent Administration	YNGBRG00232–00234	
414	Youngberg Proof of Death	YNGBRG00235-00237	
415	Youngberg Oath of Independent Administrator	YNGBRG00238	
416	Youngberg Letters of Independent Administrator	YNGBRG00239	
417	Youngberg Order Granting Independent Administration and Appointing Independent Administrator	YNGBRG00240-00242	
418	Ralph Scott File - 2020-12-08 Information for Economic Loss Determination re Youngberg	YNGBRG00243–00247	
419	Ralph Scott File - 2021-01-11 Report re Youngberg	YNGBRG00248–00272	
420	Ralph Scott File - K. Youngberg Final Leave and Earning Statement	YNGBRG00273	
421	Ralph Scott File - E-Mails between Scott and C. Parker re Youngberg	YNGBRG00274–00308	
422	Ralph Scott File - Exhibits 6-10 to Scott Report re Youngberg	YNGBRG00309–00334	
423	Ralph Scott File – Youngberg 2017 Tax Return	YNGBRG00335-00345	
424	Ralph Scott File – Scott Statement for Services, Youngberg	YNGBRG00346	
425	Ralph Scott File – Excel spreadsheet Youngberg	YNGBRG00347	
426	Ralph Scott File - Youngberg Tax Returns 2014 – 2018	YNGBRG00348–00406	
427	Report of Dr. Sharna Wood, Assess Texas (Waldrop)	Assess Texas 000001-000016	
428	Medical records from AirMethods (Waldrop)	AirMethods Med 000001-000012	
429	Medical records from Saint Francis Hospital (Waldrop)	SFH Med 000001-002561	

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
430	Medical records from Orthopedic and Trauma Services of Oklahoma (Waldrop)	OTSO Med 000001-000006	
431	Medical records from Pafford Medical Services (Waldrop)	Pafford Med 000001-000019	
432	Medical records from Vibra Hospital of Amarillo (Waldrop)	Vibra Med 000001-001091	
433	Medical records from American Medical Response (Waldrop)	AMR Med 000001-000011	
434	Medical records from Craig Hospital (Waldrop)	Craig Med 000001-003344	
435	Medical records from Swedish Medical Center (Waldrop)	Swedish Med 000001-000424	
436	Medical records from Radiology Imaging Associates (Waldrop)	RAI Med 000001-000020	
437	Medical records from Hanger Prosthetics & Orthotics West (Waldrop)	Hanger Med 000001-000046	
438	Medical records from Northwest Texas Health System (Waldrop)	NWT Med 000001-000255; WALDROP- NWT-MR- 000256-000340	
439	Medical records from Lubbock Radiology (Waldrop)	Lubbock Rad 000001	
440	Medical records from Moody NeuroRehabilitation Institute (Waldrop)	Moody Med 000001-000166	
441	Medical records from Pate Rehabilitation (Waldrop)	WALDROP- PATE-000001- 000687	
442	Medical records from Joshua Family Medicine Associates (Waldrop)	WALDROP- JFMA-MR- 000001-000104	
443	Medical records from Canadian Family Physicians (Waldrop)	Cook Med 000001-000018	
444	Waldrop Videos	Waldrop Vid 01- 35	
445	Waldrop Photos	WALDROP PHOTOS 001- 052	
446	Waldrop Financial Documents	Waldrop Fin 000001-000029	

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
447	Economic and Financial Consulting Group, Inc. (Dr. Ralph Scott) Report and Supplement (Waldrop)		
448	Catastrophic Life Care Plan (Dr. Marchetti) and Supplement (Waldrop)		
449	Medical Billing Summary (Waldrop)	Waldrop 000001	
450	Letter from Amber Nash, dated January 25, 2022 (Waldrop)	Waldrop 000002	
451	Air Methods Billing Records (Waldrop)	AirMethods Bill 000001	
452	Billing records from American Medical Response (Waldrop)	WALDROP-AMRA-BR-000001	
453	Billing records from Canadian Family Physicians (Waldrop)	WALDROP-CFP-BR-000001-000007	
454	Billing records from CNS Medical Group, PC (Waldrop)	WALDROP-CNS-BR-000001-000007	
455	Billing records from Craig Hospital (Waldrop)	WALDROP-CRAIG-BR-000001-000137	
456	Billing records from Hanger Prosthetics & Orthotics West (Waldrop)	WALDROP-HANGER-BR-000001-000029	
457	Billing records from Joshua Family Medical Associates (Waldrop)	WALDROP-JFMA-BR-000001-000003	
458	Billing records from Lubbock Diagnostic Radiology (Waldrop)	WALDROP-LDR-BR-000001-000002	
459	Billing records from Lubbock Radiology (Waldrop)	WALDROP-LUBBOCKRAD-BR-000001-000002	
460	Billing records from Moody NeuroRehabilitation Institute (Waldrop)	WALDROP-MOODY-BR-000001-000010	
461	Billing records from Northwest Texas Hospital (Waldrop)	WALDROP-NWTH-BR-000001-000013	

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
462	Billing records from Orthopedic and Trauma Services of Oklahoma (Waldrop)	WALDROP-OTSO-BR-000001-000002	
463	Billing records from Pafford Medical Services (Waldrop)	WALDROP-PAFFORD-BR-000001	
464	Billing records from Radiology Imaging Associates (Waldrop)	WALDROP-RIA-BR-000001-000016	
465	Billing records from Radiology Consultants of Tulsa (Waldrop)	WALDROP-RCT-BR-000001-000004	
466	Billing records from Rocky Mountain Holdings (Waldrop)	WALDROP-RMH-BR-000001	
467	Billing records from Saint Francis Health System (Waldrop)	WALDROP-SFHS-BR-000001-000029	
468	Billing records from Swedish Medical Center (Waldrop)	WALDROP-SWEDISH-BR-000001-000006	
469	Billing records from Vibra Hospital of Amarillo (Waldrop)	WALDROP-VIBRA-BR-000001-000013	
470	Billing records from Pate Rehabilitation (Waldrop)	WALDROP-PATE-BR-000001-000007	
471	Video footage taken at Pate Rehabilitation on March 17, 2022 (Waldrop)	WALDROP-BALLARD-00001-00075	
472	Connell Statement	Connell 000001	
473	Connell 2016, 2017, 2018 Tax Returns	Conf. Connell 000002-000024	
474	Connell W-2s	Conf. Connell 000025-000027	
475	Connell Workers Comp & Health Insurance Docs	Connell 000028-000072	
476	Connell Injury Photos	Connell 000073-000095	
477	Connell Before Photos	Connell 000097-000114	

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
478	Connell Shower quotes/photos	Connell 000307-000313	
479	Connell Air Evac EMS, Inc. Billing Affidavit and Billing Records	Connell 000314-000316	
480	Connell American Medical Response Billing Affidavit and Billing Records	Connell 000338-000339	
481	Connell Anesthesia Services of Amarillo Billing Affidavit and Billing Records	Connell 000340-000342	
482	Connell Associated Anesthesiologist, Inc. Billing Affidavit and Billing Records	Connell 000343-000345	
483	Connell Bioventus, LLC Billing Affidavit and Billing Records	Connell 000346-000348	
484	Connell Britkare Home Medical Billing Affidavit and Billing Records	Connell 000408-000417	
485	Connell High Plains Radiological Association Billing Affidavit and Billing Records	Connell 000420-000421	
486	Connell Independence Physician Management Billing Affidavit and Billing Records	Connell 000432-000438	
487	Connell Lone Star Anesthesia Consultants, PLLC Billing Affidavit and Billing Records	Connell 000439-000441	
488	Connell MDIG of Texas, PLLC Billing Affidavit and Billing Records	Connell 000442-000443	
489	Connell Northwest Texas Emergency at Town Square/Northwest Texas Hospital Billing Affidavit and Billing Records	Connell 004044-004121	
490	Connell Northwest Texas Physicians Group Billing Affidavit and Billing Records	Connell 004122-004131	
491	Connell Pafford Medical Services Billing Affidavit and Billing Records	Connell 004250-004252	
492	Connell Panhandle Surgical Hospital Billing Affidavit and Billing Records	Connell 004260-004271	
493	Connell Physicians Preferred Lab Billing Affidavit and Billing Records	Connell 004366-004369	
494	Connell Radiology Consultants of Tulsa, Inc. Billing Affidavit and Billing Records	Connell 004375-004379	
495	Connell Saint Francis Health System Billing Affidavit and Billing Records	Connell 004380-004399	

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
496	Connell Dr. Susan Goetz Billing Affidavit and Billing Records	Connell 006558–006560	
497	Connell 2019 Tax Info	Connell 006561–006571	
498	Life Care Plan of Sean Connell	Connell 006572–006662	
499	Connell Certificates	Connell 006663–006666	
500	Connell 2015-2021 Earning Statement Summaries	Connell 017160–017339	
501	Connell Earning Statement Summary May-Dec 2018	Connell 017342–017375	
502	2021 Connell Earning Statement	Connell 017376	
503	Connell 10-29-21 Dr. Risko Narrative	Connell 017377	
504	Connell 10-27-21 Amarillo Bone & Joint MRI	Connell 017378	
505	Connell 2020 W-2	Conf. Connell 017379	
506	Connell 2020 Tax Return	Conf. Connell 017380–017388	
507	Connell Amarillo Bone & Joint Billing Affidavit and Billing Records	Connell 017389–017397	
508	Connell Amarillo Bone & Joint Affidavit and Medical Records	Connell 017398–017522	
509	Amended Life Care Plan S. Connell	Connell 017523–017565	
510	Lisa Cox, MHR, CRC, CLCP, LCVS, LLC report dated November 4, 2021 (Connell)		
511	Economic and Financial Consulting Group, Inc./Dr. Ralph Scott report dated November 4, 2021 (Connell)		
512	Economic and Financial Consulting Group, Inc./Dr. Ralph Scott report dated March 23, 2022 (Connell)	Connell 017566–017571	



<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
513	Connell Air Evac EMS, Inc. Affidavit and Medical Records	Connell 000317–000337	
514	Connell Bioventus, LLC Affidavit and Medical Records	Connell 000349–000407	
515	Connell Care Communications LLC Affidavit of Common Records	Connell 000418–000419	
516	Connell Independence Physician Management Affidavit and Medical Records	Connell 000422–000431	
517	Connell Northwest Texas Hospital Affidavit and Medical Records	Connell 000446–004043	
518	Connell Northwest Texas Physicians Group Affidavit and Medical Records	Connell 004132–004249	
519	Connell Pafford Medical Services, Inc. Affidavit and Medical Records	Connell 004253–004259	
520	Connell Panhandle Surgical Hospital Affidavit and Medical Records	Connell 004272–004365	
521	Connell Physicians Preferred Lab Affidavit and Medical Records	Connell 004370–004374	
522	Connell Saint Francis Health System	Connell 004400–006557	
523	Photographs of Kevin Coffman from before Collision.	COFFMAN 00001-000020	
524	Photographs of Kevin Coffman performing training exercises before Collision.	COFFMAN 000021–000035	
525	Kevin Coffman’s Fitness Center Records from before Collision.	COFFMAN 000036–000038	
526	Kevin Coffman W-2s for 2015, 2016, 2017, 2018	COFFMAN 000039–000040	
527	Kevin Coffman Form SF-50 for 2015-2020	COFFMAN 000041–000047	
528	Photographs of Kevin Coffman at St. Francis Hospital	COFFMAN 000048-000072	
529	X-Rays of Kevin Coffman after Collision	COFFMAN 000073-000088	
530	Letter from Dr. Calder	COFFMAN 000089	
531	Letter from Dr. Risko	COFFMAN 000090	

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
532	Photograph of hardware.	COFFMAN 000091	
533	Photograph of Heidi Coffman Gym	COFFMAN 000092	
534	Life Care Plan	COFFMAN 000093-000184	
535	Video of Kevin Coffman performing rehab	COFFMAN 000185	
536	Video of Kevin Coffman performing rehab	COFFMAN 000186	
537	Video of Kevin Coffman performing rehab	COFFMAN 000187	
538	Video of Kevin Coffman performing rehab	COFFMAN 000188	
539	Video of Kevin Coffman performing rehab	COFFMAN 000189	
540	Video of Kevin Coffman performing rehab	COFFMAN 000190	
541	Video of Kevin Coffman performing rehab	COFFMAN 000191	
542	Video of Kevin Coffman performing rehab	COFFMAN 000192	
543	Video of Kevin Coffman performing rehab	COFFMAN 000193	
544	Video of Kevin Coffman performing rehab	COFFMAN 000194	
545	Video of Kevin Coffman performing rehab	COFFMAN 000195	
546	Video of Kevin Coffman performing rehab	COFFMAN 000196	
547	Video of Kevin Coffman performing rehab	COFFMAN 000197	
548	Video of Kevin Coffman performing rehab	COFFMAN 000198	
549	Medical records from Air Evac LifeTeam (Coffman)	AIR EVAC RECORDS 0001- 0010	
550	Medical bills from Air Evac LifeTeam (Coffman)	AIR EVAC BILLS 0001	
551	Medical records and St. Francis Hospital (Coffman)	SFH RECORDS 0001-1549	

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
552	Medical bills from St. Francis Hospital (Coffman)	SFH BILLS 0001-0047	
553	Medical records and bills from Pafford Air (Coffman)	PA RECORDS 0001-0008	
554	Medical bills from Pafford Air (Coffman)	PA BILLS 0001- 0003	
555	Medical records from Northwest Texas Hospital (Coffman)	NWTH RECORDS 0001- 2315	
556	Medical bills from Northwest Texas Hospital (Coffman)	NWTH BILLS 0001-0059	
557	Medical records from Amarillo Bone & Joint (Coffman)	AB&J RECORDS 0001- 0063	
558	Medical bills and Billing Affidavit produced by Defendant from Amarillo Bone & Joint. (Coffman)	AB&J BILLS 0001-0002 & Billing Affidavit produced by Defendant	
559	Medical bills (no records) from Radiology Consultants of Tulsa (Coffman)	RCT BILLS 0001-0003	
560	Medical bills (no records) from Associated Anesthesiologists (Coffman)	AA BILLS 0001	
561	Medical records from Randall Wolcott, M.D. (Coffman)	WOLCOTT RECORDS 0001- 0005	
562	Medical bills from Randall Wolcott, M.D. (Coffman)	WOLCOTT BILLS 0001	
563	Billing Affidavit produced by Defendant from Britkare Home Medical (Coffman)	Billing Affidavit produced by Defendant	
564	Medical bills from Neurosurgery Specialists (Coffman)	NS BILLS 0001	
565	Medical records from Northwest Texas Physician Network, PLLC (Dr. Glock, Dr. Sessions, Dr. Goetz, and Dr. Obrock) (Coffman)	NWTX PHY GRP RECORDS 0001-0102	

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
566	Medical bills and Billing Affidavit produced by Defendant from Northwest Texas Physician Network, PLLC (Dr. Glock, Dr. Sessions, Dr. Goetz, and Dr. Obrock) (Coffman)	NWT PHY BILLS 0001-0006 and Billing Affidavit produced by Defendant	
567	Medical records from Orthopedic and Trauma Service of Oklahoma (Dr. Calder & Dr. Barrick) (Coffman)	OTS OK RECORDS 0001-0032	
568	Medical bills and Billing Affidavit produced by Defendant from Orthopedic and Trauma Service of Oklahoma (Dr. Calder & Dr. Barrick) (Coffman)	OTS OK BILLS 0001 and Billing Affidavit produced by Defendant	
569	Medical records from Southwest Retina Specialists (Dr. Ysasaga - Optometrist) (Coffman)	YSASAGA RECORDS 0001–0014	
570	Medical bills from Southwest Retina Specialists (Dr. Ysasaga - Optometrist) (Coffman)	YSASAGA BILLS 0001-0005	
571	Medical bills from American Medical Response Ambulance (Coffman)	AMR BILLS 0001; Billing Affidavit produced by Defendant	
572	Medical records and bills from Dr. Blake Obrock (Coffman)	OBROCK RECORDS 0001-0002	
573	Medical records from Advanced Imaging Center of Amarillo (Coffman)	AIC RECORDS 0001	
574	Medical records from Northwest Texas Physicians (Coffman)	NWT PHYSICIANS RECORDS 0001–0072	
575	Medical records and bills from University of Florida/Jacksonville (Coffman)	UF HEALTH RECORDS 0001–0420	

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
576	Medical bills from University of Florida/Jacksonville (Coffman)	UF HEALTH BILLS 0001– 0031	
577	Medical records from Seaside Ophthalmology, Inc. (Coffman)	SOI RECORDS 0001–0005	
578	Medical bills and Billing Affidavit produced by Defendant from Seaside Ophthalmology, Inc. (Coffman)	Billing Affidavit produced by Defendant	
579	Medical records from Benchmark Physical Therapy Services of Tennessee (Coffman)	BENCHMARK PT RECORDS 0001–00158	
580	Medical bills from Benchmark Physical Therapy Services of Tennessee (Coffman)	BENCHMARK PT BILLS 0001- 0028	
581	Medical bills from Physicians Surgical Hospitals. (Coffman)	PSH BILLS 0001–0002; PSH BILLS 0003- 0015	
582	Medical records from Southern Orthopedics and Sports Medicine. (Coffman)	SOSM RECORDS 0001–0017	
583	Medical bills and Billing Affidavit produced by Defendant from Southern Orthopedics and Sports Medicine. (Coffman)	SOSM BILLS 0001–0003 and Billing Affidavit produced by Defendant	
584	Medical records from Dr. Kyra L. Ferrigan, O.D. (Coffman)	KLF RECORDS 0001–0003	
585	Medical bills and Billing Affidavit produced by Defendant from Dr. Kyra L. Ferrigan, O.D. (Coffman)	KFI BILLS 0001 and Billing Affidavit produced by Defendant	
586	Medical bills from Stay Focused Eyecare (Coffman)	SFE RECORDS 0001–0002	
587	Medical records from Stay Focused Eyecare (Coffman)	SFE BILLS 0001	
588	Medical records from Panhandle Surgical Hospital. (Coffman)	PSH RECORDS 0001–0260	

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
589	Medical records from Jacksonville Neurological Clinic (Coffman)	JNC RECORDS 0001-0011	
590	Medical records from Bryan Dental. (Coffman)	BD RECORDS 0001	
591	Medical X rays from Bryan Dental. (Coffman)	BD XRAY 0001–0002	
592	Medical bills from University of Florida Physician Services (Coffman)	UFPS BILLS 0001–0005	
593	March 24, 2021 Work Status Form from Southern Orthopaedics and Sports Medicine	COFFMAN 0199	
594	May 19, 2021 Physical/Occupational Therapy Prescription	COFFMAN 0200	
595	Report from Strategic Survivability Research Group	COFFMAN 0201–0206	
596	Job description for Nuclear Materials Courier	COFFMAN 0207–0218	
597	Letter from Dr. Brett Barrick	COFFMAN 0219	
598	Kevin Coffman’s W-2s for 2015 - 2020	COFFMAN 0220–0225	
599	Dr. Ralph Scott, PhD Expert Report for Kevin Coffman		
600	Dr. Jason Marchetti Expert Report and Life Care Plan dated October 15, 2021, for Kevin Coffman		
601	Lisa Cox, MHR, CRC, CLCP, LCVS, LLC Expert Report		
602	Overshiner OU Medical center records & billing statements, and/or selected excerpts thereof	Overshiner 0006-0449, 0847	
603	Overshiner Photographs depicting injuries/hospital treatment taken in October, 2018	Overshiner 0591-596	
604	Overshiner McAlpin 6/24/2019 Impairment Rating Exam	Overshiner 0739-0743	
605	Overshiner Superior Health Care records & billing statements, and/or selected excerpts thereof	Overshiner 0802-0826, 0848-0861	
606	Overshiner CF Medical billing records for Air Evac	Overshiner 00844-0846	

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
607	Overshiner vocational correspondences, applications & forms with his employer	00878-900	
608	Dr Jordan “second opinion” medical report dated 2/23/2021 re Overshiner	Overshiner 00862-00868	
609	Pages from GM manual	Overshiner 01051-1055	
610	Overshiner W-2s & Income Tax Filings	Overshiner 00597-0598, 01083, 00869-876, 01084-01387	
611	Overshiner Paystubs	Overshiner 00599-0738, 00877-01050, 01056-01063	
612	Family & pre-accident photos with Overshiner	Overshiner 01075-1082	
613	Medical life care plan of Dr Marchetti, for William Overshiner	Overshiner 00744-801	
614	Lisa Cox, MHR, CRC, CLCP, LCVS, LLC report for William Overshiner dated November 4, 2021		
615	Economic and Financial Consulting Group, Inc./Dr. Ralph Scott report for William Overshiner dated November 4, 2021		
616	Overshiner Certificate from NNSA – Distinguished Service Award	Overshiner 01392	
617	DOL notice of referral results, Overshiner	Overshiner 01393-01394	
618	Overshiner CompTIA training class completion schedule/ time log	Overshiner 01395-01396	
619	Overshiner DOL Rehabilitation plan & Award	Overshiner 01397-01400	
620	Overshiner CompTIA network security classes description	Overshiner 01388-01391	

NO.	EXHIBIT DESCRIPTION	BATES	OBJECTIONS
621	Overshiner's written statement pertaining to 10/5/2018 accident	Overshiner 00450-00451	
622	1900-2010 Timeline, Evolution of car safety features _ AA	AGENTS000001- AGENTS000007	
623	1993-06-18 Economic Impact of Motor-Vehicle Crashes-U.S., 1990	AGENTS000008- AGENTS000010	
624	1996-10 NHTSA Prelim Assessment of Crash Avoidance Systems Benefit	AGENTS000011- AGENTS000122	
625	1998 Development of Collision Avoidance Systems at Delphi	AGENTS000123- AGENTS000128	
626	1998-04-01 Delphi Sees Collision Avoidance Technology Catching on First Overseas	AGENTS000129- AGENTS000130	
627	1999 NHTSA Advanced Technologies	AGENTS000131- AGENTS000136	
628	2000-12 NHTSA Automotive Collision Avoidance System Field Op Test, 1st Ann Report	AGENTS000137- AGENTS000304	
629	2001 - 2017 Mercedes Safety Features chart	AGENTS000305- AGENTS000320	
630	2001-05-01 NTSB Special Investigation Report Vehicle & Infrastructure Based Tech for Prevention of Rear-end Collisions	AGENTS000321- AGENTS000379	
631	2001-05-25 NTSB Safety Rec H-01-14 re Collision Warning Systems	AGENTS000380- AGENTS000386	
632	2006-01-03 Delphi Provides Advanced Collision Warning System for European	AGENTS000387- AGENTS000387	
633	2006-08 Bosch Front Radar Sensor	AGENTS000388- AGENTS000388	
634	2007 07-0450-O Collision Warning with Automatic Brake, NHTSA	AGENTS000389- AGENTS000397	
635	2008-01-14 Delphi, Mobileye to Supply Active Safety to Volvo	AGENTS000389- AGENTS000401	
636	2008-10-03 Delphi Offers Collision Warning System For Trucks - Products - Trucking Info	AGENTS000402- AGENTS000403	
637	2009-09 What Will the Car of the Future Look Like, Delphi	AGENTS000404- AGENTS000411	
638	2010-06 NHTSA Crash Imminent Braking (COB) 2d Annual Report	AGENTS000412- AGENTS000458	
639	2010-09-19 Collision Warning with Full Auto Braking	AGENTS000459- AGENTS000460	



NO.	EXHIBIT DESCRIPTION	BATES	OBJECTIONS
640	2010-10-01 Affordable Cars Could Soon Offer Collision-Avoidance Systems	AGENTS000461- AGENTS000462	
641	2011 Mercedes-Benz Collision-Prevention Assist	AGENTS000463- AGENTS000464	
642	2011-01 Development of a Camera-Based Forward Collision Alert System	AGENTS000465- AGENTS000476	
643	2011-03-24 Bendix Wingman Advanced Collision Mitigation Tech brochure	AGENTS000477- AGENTS000480	
644	2011-05-10 Q&A with Delphi_ Advanced driver assist systems	AGENTS000481- AGENTS000482	
645	2011-09 Objective Tests for Automatic Crash Imminent Braking (CIB) Systems, Final 1 of 2	AGENTS000483- AGENTS000632	
646	2011-09 RPO Central_ So What's An RPO Code Anyway; GM Authority	AGENTS000633- AGENTS000634	
647	2011-09-30 GM Introduces Two Industry-First Safety Features	AGENTS000635- AGENTS000637	
648	2012-02-10 Sensor Fusion Enables Cadillac Safety Advancements	AGENTS000638- AGENTS000640	
649	2013 Chevrolet Express Owner's Manual	AGENTS000641- AGENTS001052	
650	2013 Chevrolet Express 3500 Specs, Price, MPG & Reviews, Cars	AGENTS001054- AGENTS001059	
651	2013 GM Chevy Express Van VIN 1GAZG1FA8D1168728 Decoder	AGENTS001060- AGENTS001064	
652	2013-02-07 NHTSA NCAP Forward Collision Warning System Confirmation Test	AGENTS001065- AGENTS001104	
653	2013-05-07 2014-Chevrolet-Impala-Focuses-on-Crash-Avoidance-From-All-Angles	AGENTS001105- AGENTS001106	
654	2013-01 Advanced Brake Assist - Real World effectiveness of current implementations and next generation enlargements by Mercedes-Benz, Schittenhelm, No. 13-0194	AGENTS001107- AGENTS001120	
655	2014-01 UMTRI Assessment of Effectiveness of Adv Collision Avoidance Tech	AGENTS001121- AGENTS001165	
656	2014-04-30 The Crash-Proof Car - IEEE Spectrum	AGENTS001166- AGENTS001172	
657	2014-09-09 GM Has Long Envisioned a Day When Cars Don't Crash	AGENTS001173- AGENTS001176	

NO.	EXHIBIT DESCRIPTION	BATES	OBJECTIONS
658	2014-12-04 City Safety by Volvo - outstanding crash prevention standard on XC90	AGENTS001177- AGENTS001179	
659	2015-03-16 Comparison of Expected Crash and Injury Reduction.	AGENTS001180- AGENTS001182	
660	2015-05-19 NTB, SIR1501 Special Investigation Report, Use of Forward Collision Avoidance Systems	AGENTS001183- AGENTS001245	
661	2015-09 Bendix Wingman Fusion Brochure BW3025	AGENTS001246- AGENTS001255	
662	2015-09-11 10 car companies make automatic brakes standard	AGENTS001256- AGENTS001257	
663	2015-11-13 Mercedes-Benz Brake Assist System _ Mercedes-Benz of Massapequa	AGENTS001258- AGENTS001258	
664	2016 Autonomous Vehicle Technology, A Guide for Policymakers	AGENTS001259- AGENTS001472	
665	2016 Saving Lives with Safer Cars - The Past, Present and Future of Consumer Safety Ratings	AGENTS001473- AGENTS001489	
666	2016-01-27 Effectiveness of forward collision warning & autonomous emergency braking	AGENTS001490- AGENTS001500	
667	2016-01-28 Front crash prevention slashes police-reported rear-end crashes	AGENTS001501- AGENTS001505	
668	2016-03 GM Supports Historic Agreement on Automatic Emergency Braking	AGENTS001506- AGENTS001507	
669	2017-04 HLDI Bull34.06 GM collision avoidance features	AGENTS001508- AGENTS001525	
670	2017-09 HLDI Predicted availability & fitment of safety features	AGENTS001526- AGENTS001537	
671	2018-02 European Commission, Vehicle Safety, European Commission, Directorate General for Transport	AGENTS001538- AGENTS001616	
672	2018-03 Evolution-and-Benefits-of-Collision-Avoidance, Final	AGENTS001617- AGENTS001622	
673	2018-07-19 IIHS-HLDI CAS Crash Course	AGENTS001623- AGENTS001735	
674	2018-09 Predicted availability & fitment of safety features, 2018 update	AGENTS001736- AGENTS001747	
675	2018-11 Chevrolet Express Gains Active Safety Tech _ GM Authority	AGENTS001748- AGENTS001750	
676	2018-11-05 Car & Driver, We Crash Four Cars to Test Automatic Braking Systems	AGENTS001751- AGENTS001757	

NO.	EXHIBIT DESCRIPTION	BATES	OBJECTIONS
677	2018-11-13 IIHS GM front crash prevention systems cut police-reported crashes	AGENTS001758- AGENTS001761	
678	2019-03-01 Automatic Emergency Braking & Forward Coll	AGENTS001762- AGENTS001772	
679	2019-03-13 10 automakers equipped most of their 20	AGENTS001773- AGENTS001776	
680	2019-06-11 Hands-on with the 2019 Mercedes-Benz Sprinter safety tech - Roadshow	AGENTS001777- AGENTS001781	
681	2019-08-05 Guide to Automatic Emergency Braking - Consumer Reports	AGENTS001782- AGENTS001789	
682	2019-09 UMTRI Analysis of Field Effectiveness of GM Safety & Adv Headlighting Systems	AGENTS001790- AGENTS001822	
683	2019-12-31 GM Annual Report SEC Form 10-K	AGENTS001823- AGENTS002071	
684	2020 Cadillac-CT5 Owner's Manual	AGENTS002072- AGENTS002430	
685	2020 Euro NCAP AEB Car-to-Car Vehicle Ratings Explained	AGENTS002431- AGENTS002433	
686	2020 Introducing the Next Generation 2021 GMC Yukon _ GMC Life	AGENTS002434- AGENTS002446	
687	2020-03-04 NTSB letter to ET Doc, FCC, re Intelligent Transportation System	AGENTS002447- AGENTS002451	
688	2020-04-06 CARFAX -2013 CHEVROLET EXPRESS G3500 LT_1GAZG1FA8D1168728	AGENTS002452- AGENTS002455	
689	2020-04-10 How Tesla Autopilot compares to Cadillac Super Cruise - Business Insider	AGENTS002456- AGENTS002484	
690	2020-04-17 NTSB Safety Recommendations	AGENTS002485- AGENTS002512	
691	2020-08-26 Bosch Automatic emergency braking	AGENTS002513- AGENTS002522	
692	2020-09-24 Bosch Front radar sensor	AGENTS002523- AGENTS002530	
693	2021-01-05 Guide to Cars with Advanced Safety Systems - Consumer Reports	AGENTS002531- AGENTS002558	
694	A quick guide to ADAS - Delphi Auto Parts	AGENTS002559- AGENTS002568	
695	Advanced Driver Assistance Systems (ADAS) calibration _ Delphi Auto Parts	AGENTS002569- AGENTS002575	

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
696	General Motors Forward Collision Alert Info _ GM Authority	AGENTS002576- AGENTS002577	
697	General Motors Front Automatic Braking Info _ GM Authority	AGENTS002578- AGENTS002579	
698	GM Wentzville Assembly Plant	AGENTS002580- AGENTS002584	
699	NHTSA Automatic Emergency Braking	AGENTS002585- AGENTS002586	
700	NHTSA Forward Collision Warning Systems	AGENTS002587- AGENTS002588	
701	Should Autonomous Emergency Braking (AEB) Be Mandatory	AGENTS002589- AGENTS002593	
702	Links to online videos	AGENTS002594- AGENTS002594	
703	2018-10-30 Photos taken by Cline Young	AGENTS002595- AGENTS002707	
704	2019-04-16 Photos taken by Cline Young	AGENTS002708- AGENTS003019	
705	Gilbert Engineering Drone Photos	AGENTS003020- AGENTS003101	
706	Gilbert Engineering Scene Photos	AGENTS003102- AGENTS003179	
707	Gilbert Engineering Vehicle (Van) Photos	AGENTS003180- AGENTS003474	
708	Gilbert Engineering Vehicle MG Photos	AGENTS003475- AGENTS003624	
709	Gilbert Engineering Vehicle MR Photos	AGENTS003625- AGENTS003944	
710	2019-01-11 Official Oklahoma Traffic Collision Report, Final	AGENTS003945- AGENTS003949	
711	2018-10-05 Oklahoma Highway Patrol Motor Vehicle Death Case File	AGENTS003950- AGENTS010716	
712	2018-10-12 OHP Report of Investigation	AGENTS010717- AGENTS010732	
713	2018-11-19 OHP Drone Photo	AGENTS010733- AGENTS010733	
714	2018-10-05 Sean Connell statement	AGENTS010734- AGENTS010734	
715	2018-10-16 Kevin Coffman Interview	AGENTS010735- AGENTS010736	
716	2018-10-05 Daniel Forbus Written Statement to OK DPS	AGENTS010737- AGENTS010738	
717	2018-10-05 Daniel Forbus Written Statement [3 p]	AGENTS010739- AGENTS010741	

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
718	2018-10-23 Donald Thomas Statement to OHP	AGENTS010742- AGENTS010747	
719	2018-11-05 Jimmy Hennesey Statement	AGENTS010748- AGENTS010748	
720	Scene Photos 0001-0088	AGENTS010749- AGENTS010836	
721	DashCam, Trooper Hart #3313	AGENTS010837	
722	OKDPS Interview of Christie Connell	AGENTS010838	
723	OKDPS Interview of Donald Thomas	AGENTS010839	
724	OKDPS Interview of Daniel Forbus 1	AGENTS010840	
725	OKDPS Interview of Daniel Forbus 2	AGENTS010841	
726	OKDPS Interview of Kevin Coffman	AGENTS010842	
727	OKDPS Interview of Tina Smith	AGENTS010843	
728	OKDPS Interview of Will Overshiner	AGENTS010844	
729	OKDPS Mapping files [native]	AGENTS010845	
730	OKDPS Photo Log 1	AGENTS010846- AGENTS010850	
731	OKDPS Photo Log 2	AGENTS010851- AGENTS010851	
732	OKDPS Drone Photos	AGENTS010852- AGENTS011079	
733	OKDPS Drone Photos 2	AGENTS011080- AGENTS011082	
734	OKDPS Scene Photos	AGENTS011083- AGENTS011108	
735	OKDPS Thomas Photos	AGENTS011109- AGENTS011112	
736	OKDPS Tina Smith Photo	AGENTS011113- AGENTS011113	
737	OKDPS Vericom	AGENTS011114- AGENTS011114	
738	Carfax - Chevy Express Van	AGENTS011115- AGENTS011116	
739	Carfax - Kenworth	AGENTS011117- AGENTS011120	
740	2002-03-07 GM rolls out 2003 full-size vans - Fleet Owner	AGENTS011121- AGENTS011130	
741	2003 Chevrolet Express Owners Manual	AGENTS011131- AGENTS011532	
742	2011 GM Fleet Guide	AGENTS011533- AGENTS011634	

NO.	EXHIBIT DESCRIPTION	BATES	OBJECTIONS
743	2013 GM Car & Truck Guide	AGENTS011635- AGENTS011745	
744	2016 GM Supports Historic Agreement on Automatic Emergency Braking	AGENTS011746- AGENTS011748	
745	2019 Chevy Express Cutaway 3500 and 4500 Vans - GM Fleet	AGENTS011749- AGENTS011758	
746	2019 GM Fleet Guide	AGENTS011759- AGENTS011869	
747	2019-08-22 <i>Wen v GM</i> , Affidavit of Brian Thompson	AGENTS011870- AGENTS011881	
748	2020 Chevy Express Cutaway 3500 and 4500 Vans - GM Fleet	AGENTS011882- AGENTS011890	
749	2020 GMC Safety & Driver Assistance Technology - 2020 Vehicles	AGENTS011891- AGENTS011899	
750	2021 Vehicle Active Safety Technologies - GM Fleet	AGENTS011900- AGENTS011904	
751	IIHS Safety Ratings - Front Crash Protection 2013	AGENTS011905- AGENTS011910	
752	IIHS Safety Ratings - Front Crash Protection 2014	AGENTS011911- AGENTS011915	
753	IIHS Safety Ratings - Front Crash Protection 2015	AGENTS011916- AGENTS011921	
754	IIHS Safety Ratings - Front Crash Protection 2016	AGENTS011922- AGENTS011928	
755	IIHS Safety Ratings - Front Crash Protection 2017	AGENTS011929- AGENTS011937	
756	Links to Videos - 1st Supplemental	AGENTS011938- AGENTS011938	
757	2005-06-06 Motor Vehicle Safety Technology Development, The Road Ahead, An Industry View; Lange, Robert	AGENTS011939- AGENTS011956	
758	2013 Cadillac SRX Owner's Manual	AGENTS011957- AGENTS012388	
759	2018 Toyota Safety Sense brochure	AGENTS012389	
760	2020-08-07 Equipment World, Truck crashes cut by 50% for these major fleets using driver assistance tech	AGENTS012390- AGENTS012393	
761	Ray Kiefer deposition exhibits from <i>Spencer v GM</i>	AGENTS012394	
762	1956 Firebird II video from GM Heritage website	AGENTS012395	



<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
763	1956 GM Heritage Center, Self-Driving Cars in 1956	AGENTS012396- AGENTS012403	
764	1976 Kossar - high tech RSV	AGENTS012404- AGENTS012412	
765	1979-06-06 Struble -Highlights of the Minicars' RSV Program	AGENTS012413- AGENTS012441	
766	1980 Kossar High Technology RSV	AGENTS012442- AGENTS012449	
767	2004 Cadillac XLR Owners Manual	AGENTS012450- AGENTS012807	
768	2005-05 Automotive Collision Avoidance System Field Operational Test, Final Program Report, DOT HS 809 886	AGENTS012808- AGENTS012918	
769	2005 Cadillac STS Owners Manual	AGENTS012919- AGENTS013356	
770	2005 Cadillac STS review - Roadshow	AGENTS013357- AGENTS013361	
771	2005-050 Automotive Collision Avoidance System Field Operational Test Final Rpt NHTSA	AGENTS013362- AGENTS013472	
772	2006 Cadillac DTS Owner's Manual	AGENTS013473- AGENTS013920	
773	2006-09-01 2006 Cadillac DTS, The last stalwart at Cadillac gets a sportier shape. Car & Driver.	AGENTS013921- AGENTS013927	
774	2008 Saturn Ad - The Rich Don't Deserve to be Safer	AGENTS013928- AGENTS013928	
775	2010 NHTSA Safety is Not an Option	AGENTS013929- AGENTS013929	
776	2011-07-29 Fed Reg NCAP Safety Labeling, Final Rule	AGENTS013930- AGENTS013947	
777	2011-09-29 New Camera-Based Collision Alert Debuts on GMC Terrain. GMC Pressroom	AGENTS013948- AGENTS013949	
778	2011-11-14 Chevrolet Equinox Raises Content Bar for 2012. GM Newsroom	AGENTS013950- AGENTS013951	
779	2012-03-27 Technology on XTS, ATS Can Help Avoid Crashes. GM Newsroom	AGENTS013952- AGENTS013954	
780	2012-04-02 Cadillac Enhances Technology and Design on 2013 SRX. GM Newsroom	AGENTS013955- AGENTS013961	
781	2012-05-12 2013 GMC Terrain Denali Priced from \$35,350. GM Newsroom	AGENTS013962- AGENTS013962	

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
782	2012-06-22 Cadillac ATS Safety is Rooted in Avoidance. GM Pressroom	AGENTS013963- AGENTS013969	
783	2013 Cadillac ATS Owners Manual	AGENTS013970- AGENTS014419	
784	2013 Cadillac SRX Owners Manual	AGENTS014420- AGENTS014851	
785	2013 Cadillac XTS Owners Manual	AGENTS014852- AGENTS015290	
786	2013-03-01 Feature Spotlight: Cadillac's Driver Assist Technology Makes Driving Safer, Easier. GM Authority	AGENTS015291- AGENTS015293	
787	2013-05-29 2014 Sierra Denali Pairs High-Tech Luxury and Capability. GM Newsroom	AGENTS015294- AGENTS015297	
788	2014-02-24 2015 GMC Yukon Family Designed for Safety and Security - including Segment's First Front-Center Air Bag. GM Media	AGENTS015298- AGENTS015300	
789	2015-10-23 This Cadillac Concept had radar crash-avoidance in 1959. Road & Track.	AGENTS015301- AGENTS015304	
790	2015-10-30 Minutes NHTSA-2015-0101-0002. Automatic Emergency Braking (AEB) Industry Voluntary Commitment Working Group Meeting	AGENTS015305- AGENTS015310	
791	2016-02-22 Minutes NHTSA-2015-0101-0003_attachment_1. Automatic Emergency Braking (AEB) Industry Voluntary Commitment Working Group Meeting	AGENTS015311- AGENTS015313	
792	2016-03-16 Minutes NHTSA-2015-0101-0004_attachment_1. Automatic Emergency Braking (AEB) Industry Voluntary Commitment Working Group Meeting	AGENTS015314- AGENTS015317	
793	2016-03-25 Minutes NHTSA-2015-0101-0005_attachment_1. Automatic Emergency Braking (AEB) Industry Voluntary Commitment Working Group Meeting	AGENTS015318- AGENTS015414	
794	2017 Performance Comparison Between a Camera Only AEF-FCW and a Camera-Radar Fusion AEB-FCW. Caspar, et al. No. 17-0283	AGENTS015415- AGENTS015422	



<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
795	2018-08-08 The history of adaptive cruise control. Autonomous Vehicle International	AGENTS015423- AGENTS015424	
796	2019 GM Heritage Center, Self-Driving Cars, in 1956	AGENTS015425- AGENTS015432	
797	2019-09 UMTRI-2019-6 Final Analysis of the Field Effectiveness of GM Production Active Safety and Advanced Headlighting Systems	AGENTS015433- AGENTS015465	
798	2019-10-31 FCA submission NHTSA-2015-0101-0060_attachment_1	AGENTS015466- AGENTS015466	
799	2015-10-23 This Cadillac Concept had radar crash-avoidance in 1959. Road & Track.	AGENTS015467- AGENTS015468	
800	Second Supplemental list of links to online videos	AGENTS015467- AGENTS015467	
801	2001-04 NHTSA Research Note re Rollover Propensity of 15-Passenger Vans, Garrot et al.	AGENTS015468- AGENTS015479	
802	2001-04-09 DOT Consumer Advisory & 2002-04-15 Consumer Advisory re increased rollover risk of 15-passenger vans	AGENTS015480- AGENTS015485	
803	2002-10-15 NTSB Safety Report, Evaluation of the Rollover Propensity of 15-passenger Vans	AGENTS015486- AGENTS015535	
804	2002-11-01 NTSB Safety Recommendation H-02-29 re potential of technological systems, particularly electronic stability control systems, to assist drivers of 15-passenger vans	AGENTS015536- AGENTS015540	
805	2003-08-04 NTSB Safety Recommendation H-03-22 re training for drivers of 12- and 15-passenger vans	AGENTS015541- AGENTS015545	
806	2003-08-04 NTSB Safety Recommendation H-03-18 re revising definition of buses and commercial vehicles to apply to 12- and 15-passenger vans	AGENTS015546- AGENTS015548	
807	2003-08-04 NTSB Safety Recommendation H-03-22 and -24 through -27 re training for drivers of 12- and 15-passenger vans	AGENTS015549- AGENTS015557	

<b>NO.</b>	<b>EXHIBIT DESCRIPTION</b>	<b>BATES</b>	<b>OBJECTIONS</b>
808	2004-04-21 NTSB Safety Recommendation H-4-8 through -14, Child Care Transportation Oversight Agencies	AGENTS015558- AGENTS015568	
809	2004-06 NHTSA/DOT HS 809 704 Testing the Dynamic Rollover Resistance of Two 15-Passenger Vans with Multiple Load Configurations	AGENTS015569- AGENTS015629	
810	2004-12 NTSB Safety Alert re 15-Passenger Vans	AGENTS015630- AGENTS015631	
811	2004 Cadillac XLR brochure	AGENTS015632- AGENTS015651	
812	2004 Cadillac XLR Base 2dr Roadster pricing & specs	AGENTS015652- AGENTS015665	
813	2006 Savana Express 66-l-v8 Duramax, Tom Sliney-Program Engineering Manager	AGENTS015666- AGENTS015702	
814	2013 Chevrolet Express 3500, New Car Review, AutoTrader	AGENTS015703- AGENTS015707	
815	2018-10-05 Fatal Motor Vehicle Traffic Accident Analysis & Reconstruction Report, by Amit Reizes	AGENTS015708- AGENTS015716	
816	2003-05-20 Honda Develops World's First Collision Mitigation Brake System	AGENTS015717- AGENTS015720	
817	2005-08-17 2006 Acura RL - Safety Overview	AGENTS015721- AGENTS015724	
818	2006 Acura RL Sedan 35 TDS EVOX 2 815 image	AGENTS015725- AGENTS015725	
819	2011-10-01 49 CFR Vol7 Part 575, Ch V Safety Regulations	AGENTS015726- AGENTS015782	
820	2012 AEB Fitment Survey 2012 _ Euro NCAP - For safer cars crash test safety rating	AGENTS015783- AGENTS015784	
821	2012-06 EuroNCAP AEB Fitment Survey leaflet	AGENTS015785- AGENTS015794	
822	2013 Euro NCAP 2013 AEB Fitment Survey	AGENTS015795- AGENTS015796	
823	2013 Implementation of Autonomous Emergency Braking (AEB), the next step in Euro NCAP'S safety assessment	AGENTS015797- AGENTS015802	
824	2013-10-29 EuroNCAP press release, On the Road with Autonomous Emergency Braking Systems	AGENTS015803- AGENTS015804	

NO.	EXHIBIT DESCRIPTION	BATES	OBJECTIONS
825	2015-12-04 Fixing America's Surface Transportation Act [Pub. Law 114-94]	AGENTS015805- AGENTS016295	
826	2015-12-16 Fed. Register 80, No. 241, NCAP Notice 2015-0119-0001	AGENTS016296- AGENTS016366	
827	2019-11-07 Continental High-tech Solution for Anticipatory Driving	AGENTS016367- AGENTS016371	
828	2020-04-28 85 FR 23598 Gov. 5-Star Safety Ratings	AGENTS016372- AGENTS016375	
829	2020-09-23 Congress Turns to the GAO, after NHTSA Blows Deadlines	AGENTS016376- AGENTS016378	
830	2021-08-25 Japanese Automaker Create First Adaptive Cruise Control System	AGENTS016379- AGENTS016386	
831	2021-12-18 Most New Cars Have AEB Safety Technology That Prevents Crashes - Consumer Reports	AGENTS016387- AGENTS016392	
832	2021-12-29 Watch semi-truck cover 80 miles on public streets, driverless	AGENTS016393- AGENTS016394	
833	2022-03-03 NCAP-ADAS- Request for Comments, NHTSA 2021-0002	AGENTS016395- AGENTS016630	
834	Continental ARS 308 Long Rng Radar Sensor brochure	AGENTS016631- AGENTS016633	
835	Continental ARS 404 - Overview	AGENTS016634- AGENTS016639	
836	Continental ARS 408-21 Premium Long Range Radar Sensor spec sheet	AGENTS016640- AGENTS016641	
837	Continental ARS_404_21_EN_HS Long Range Radar Sensor 77GHz brochure	AGENTS016642- AGENTS016644	
838	Continental Corporation USA website excerpts	AGENTS016645- AGENTS016657	
839	Video: Chrysler Town & Country - whisper ad	AGENTS016658	
840	Video: Cadillac - ACC ON - Dump 20 mph	AGENTS016659	
841	Video: Subaru - Same Lane - Dump 10 mph	AGENTS016660	
842	Video: Subaru - Same Lane - Dump 20 mph	AGENTS016661	
843	Video links - 3d Supplemental	AGENTS016662	
844	49 USC SECTION 30103	AGENTS016663- AGENTS016678	
845	49 USC SECTION 30111	AGENTS016679- AGENTS016687	

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846	49 USC SECTION 30119	AGENTS016688- AGENTS016693	
847	49 USC SECTION 30120	AGENTS016694- AGENTS016701	
848	49 USC SECTION 30165	AGENTS016702- AGENTS016706	
849	49 USC SECTION 30170	AGENTS016707- AGENTS016708	
850	2006-11-05 ASME Society Policy, Code of Ethics of Engineers	AGENTS016709- AGENTS016710	
851	2012-0-01 ASME Society Policy, Code of Ethics of Engineers	AGENTS016711- AGENTS016712	
852	2013 Chevrolet Express Passenger 3500 15 Pass Van RWD, 22 NHTSA Complaints	AGENTS016713- AGENTS016733	
853	2013 Chevrolet Express Passenger 3500 15 Pass Van RWD, NHTSA 8 Recalls	AGENTS016734- AGENTS016745	
854	2013-08-03 Cadillac Radar Sensor Fusion, CaddyInfo – Cadillac Conversations Blog	AGENTS016746- AGENTS016750	
855	2019-09-03 GM's 5th Supplemental Responses to Plaintiff's 2nd Interrogatories; <i>Fox v GM</i>	AGENTS016751- AGENTS016763	
856	GM's Supplemental Responses to Interrogatories, <i>Collins v GM</i>	AGENTS016764- AGENTS016768	
857	2008-03-07 GM's Supplemental Interrogatories Concerning Amounts Paid to Expert Witnesses; <i>Reynolds v. GM</i>	AGENTS016769- AGENTS016778	
858	Exponent Invoices	AGENTS016779- AGENTS016782	
859	Delta V Biomechanics Invoices	AGENTS016783- AGENTS016791	
860	Dynamic Analysis Gr Invoices	AGENTS016792- AGENTS016812	
861	Safety hierarchy	AGENTS016813- AGENTS016813	
862	2010-04-12 SAE 2010-01-0145, The Effect of Frontal Collision Delta-V and Restraint Status on Injury Outcome, Heller, et al.		
863	1997 SAE 970393, Relationships Between Crash Casualties and Crash Attributes		

NO.	EXHIBIT DESCRIPTION	BATES	OBJECTIONS
864	CV of Dr. Jason Marchetti		
865	CV of Ralph Scott, PhD		
866	2010-0412-12 SAW 2010-01-0145, The Effect of Frontal Collision Delta-V and Restraint Status on Injury Outcome, Heller, et al.		
867	1997 SAE 970393, Relationships Between Crash Casualties and Crash Attributes		

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 15th day of April, 2022, I electronically transmitted the above and foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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